

EXHIBIT 32

JOSEPH WANAGEL
5/21/2021

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UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

HUNTERS CAPITAL, LLC, et al.,)	
)	
Plaintiffs,)	
)	
vs.)	No. 20-cv-00983-TSZ
)	
CITY OF SEATTLE,)	
)	
Defendant.)	

Zoom Video Deposition Upon Oral Examination

Of

JOSEPH WANAGEL

30(b)6 Olive ST Apartments

DATE: Friday, May 21, 2021

REPORTED BY: Mindy L. Suurs, CSR No. 2195

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1 accessing your buildings?

2 A. There are certainly times when they told me that
3 there was garbage in the streets, march goings on, things
4 on fire. Were there times that they probably would have
5 had to crash into something or drive on the sidewalk or
6 find some alternative route to get to the building? Yes.
7 Sidewalk access -- would it have been possible to get
8 there? Yes. Would they have been at risk, I mean of
9 physical harm, I would say likely.

10 I guess it's really a matter of like, okay, so if
11 there's a bunch of people yelling "kill cops" and there's a
12 dumpster on fire, are they -- is that -- is that physically
13 stopping you from getting somewhere?

14 Q. Right. So what I'm talking about is an actual
15 physical barrier that would have prevented access to your
16 building, and it sounds like that did not occur, to your
17 knowledge; right?

18 MR. PHILLIPS: Objection to form.

19 A. I guess the answer actual physical -- there were
20 certainly times when there was trash in the street, so if
21 you consider that a physical barrier, the answer would be
22 yes -- like dumpsters and garbage cans, like that was a
23 normal thing for them to do -- is throw dumpsters and
24 garbage cans in the streets, which would -- you would
25 physically have to move something to get to the building.

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REPORTER'S CERTIFICATE

I, Mindy L. Suurs, the undersigned Certified Court Reporter, pursuant to RCW 5.28.010, authorized to administer oaths and affirmations in and for the State of Washington, do hereby certify:

That the foregoing testimony of JOSEPH WANAGEL was given before me at the time and place stated therein and thereafter was transcribed under my direction;

That the sworn testimony and/or proceedings were by me stenographically recorded and transcribed under my supervision, to the best of my ability;

That the foregoing transcript contains a full, true, and accurate record of all the sworn testimony and/or proceedings given and occurring at the time and place stated in the transcript;

That the witness, before examination, was by me duly sworn to testify the truth, the whole truth, and nothing but the truth;

That I am not a relative, employee, attorney, or counsel of any party to this action or relative or employee of any such attorney or counsel and that I am not financially interested in the said action or the outcome thereof;

DATE: May 28, 2021

Mindy L. Suurs

Mindy L. Suurs
Certified Court Reporter #2195



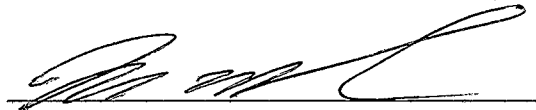
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S I G N A T U R E

I declare that I have read my within deposition,
taken on Friday, May 21, 2021, and the same is true and
correct save and except for changes and/or corrections, if
any, as indicated by me on the "CORRECTIONS" flyleaf page
hereof.

Signed in Bothe / I, Washington,
this 25th day of June, 2021.



JOSEPH WANAGEL